

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
<b>Entercom License, LLC</b>	)	MB Docket No. 16-357
Applications for Renewal of License for Station	)	Facility ID No. 65483
KDND(FM), Sacramento, California	)	File Nos. BRH-20050728AUU and
	)	BRH-20130730ANM
	)	

To: Marlene H. Dortch, Secretary  
Attn: Chief Administrative Law Judge Richard L. Sippel

**ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE A SURREPLY  
TO PETITION TO ENLARGE ISSUES**

1. On January 9, 2017, Media Action Center (MAC) and Sue Wilson (collectively, Petitioners) filed a petition to enlarge the issues in the above-captioned proceeding (Petition)<sup>1</sup> to add issues concerning the operations of five additional broadcast stations (Other Sacramento Stations) licensed to Entercom License, LLC (Entercom) (formerly known as Entercom Sacramento License, LLC). At the time the Petition was filed, Entercom's applications for renewal of the Other Sacramento Stations were pending before the Commission's Media Bureau. On January 18, 2017, the Media Bureau granted Entercom's applications for renewal of the Other Sacramento Stations.<sup>2</sup>

2. The Enforcement Bureau (Bureau) opposed the Petition, asserting, in part, that the Media Bureau's grant of Entercom's applications for renewal mooted many of the issues

---

<sup>1</sup> See Petition to Enlarge Issues by Media Action Center and Sue Wilson, filed Jan. 9, 2017 (Petition).

<sup>2</sup> See Correspondence dated Jan. 18, 2007 to counsel for Entercom Sacramento License, LLC from Peter H. Doyle, Chief, Audio Division, Media Bureau, related to Stations KUDL(FM), KRXQ(FM), KSEG(FM), KKDO(FM), and KIFM(AM).

Petitioners raised in their Petition.<sup>3</sup> In their Reply, Petitioners falsely accuse the Bureau of working “behind the scenes” with the Media Bureau to concoct a method to deprive Petitioners of the relief they seek from the Presiding Judge.<sup>4</sup> Petitioners do not offer any evidence in support of these outrageous accusations.

3. The Bureau believes it is in the public interest for the Presiding Judge to have an accurate record as he considers whether to grant the Petition. Accordingly, the Acting Chief, Enforcement Bureau, through his attorneys, hereby respectfully requests leave to file a surreply to the Reply, filed concurrently with this Motion.

---

<sup>3</sup> See Enforcement Bureau’s Opposition to Petition to Enlarge Issues, filed Jan. 18, 2017.

<sup>4</sup> See, e.g., Reply to Enforcement Bureau’s Opposition to Petition to Enlarge Issues, filed Jan. 26, 2017, at 2, 7. See also Reply at 1.

Respectfully submitted,

Michael Carowitz  
Acting Chief, Enforcement Bureau



---

Pamela S. Kane  
Special Counsel  
Investigations and Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

Michael Engel  
Special Counsel  
Market Disputes Resolution Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 4-C366  
Washington, D.C. 20554  
(202) 418-7330

February 1, 2017

## CERTIFICATE OF SERVICE

Pamela S. Kane certifies that she has on this 1<sup>st</sup> day of February, 2017, sent copies of the foregoing "ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE A SURREPLY TO PETITION TO ENLARGE ISSUES" via email to:

The Honorable Richard L. Sippel  
Chief Administrative Law Judge  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554 (by hand, courtesy copy)

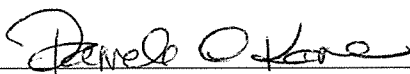
Rachel Funk  
Office of the Administrative Law Judge  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554 (by hand, courtesy copy)

Robert G. Kirk  
Wilkinson Barker Knauer LLP  
1800 M Street, N.W.  
Suite 800N  
Washington, D.C. 20036  
[rkirk@wbklaw.com](mailto:rkirk@wbklaw.com)

Jane E. Mago  
Special Counsel  
Entercom Communications Corp.  
4154 Cortland Way  
Naples, FL 34119  
[jane.mago@entercom.com](mailto:jane.mago@entercom.com)

Steven A. Lerman  
Lerman Senter PLLC  
2001 L Street, NW, Suite 400  
Washington, D.C. 20036.  
[slerman@lermansenter.com](mailto:slerman@lermansenter.com)

Michael Couzens  
Michael Couzens Law Office  
6536 Telegraph Avenue  
Suite B201  
Oakland, CA 94609  
[cuz@well.com](mailto:cuz@well.com)

  
\_\_\_\_\_  
Pamela S. Kane